



PAIA MANUAL

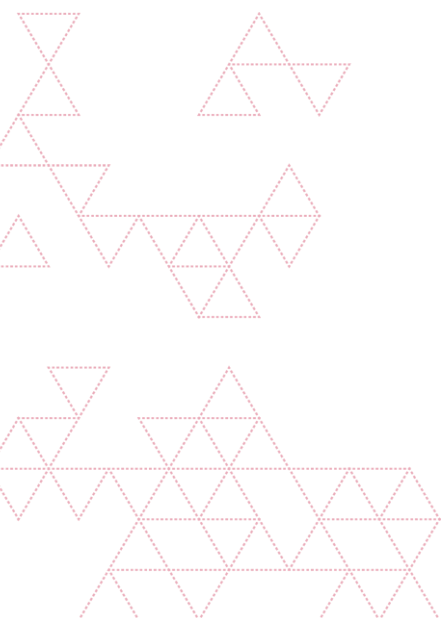
Prepared in terms of section 51
of the Promotion of Access to
Information Act 2 of 2000 (as
amended)

RESOLVE CORPORATE SERVICES (PTY) LTD

February 2026

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PAIA MANUAL

1. LIST OF ACRONYMS AND ABBREVIATIONS

"A&R"	Articles and Memorandum of Association (for companies)
"BEE"	Black Economic Empowerment
"BBBEE"	Broad-Based Black Economic Empowerment
"CEO"	Chief Executive Officer
"CIO"	Chief Information Officer
"CIPC"	Companies and Intellectual Property Commission
"DIO"	Deputy Information Officer
"IO"	Information Officer
"JSE"	Johannesburg Stock Exchange
"Ltd"	Limited
"Minister"	Minister of Justice and Correctional Services
"MOI"	Memorandum of Incorporation
"NPO"	Non-Profit Organization
"PAIA"	Promotion of Access to Information Act No.2 of 2000 (as Amended)
"POPIA"	Protection of Personal Information Act No.4 of 2013
"Pty Ltd"	Proprietary Limited
"Regulator"	Information Regulator
"Republic"	Republic of South Africa
"ROC"	Register of Companies
"SARS"	South African Revenue Service
"UBO"	Ultimate Beneficial Ownership
"VAT"	Valued-Added Tax

2. PURPOSE OF PAIA MANUAL

This PAIA Manual is useful for the public to-

- 1.1 check the categories of records held by a body which are available without a person having to submit a formal PAIA request;
- 1.2 have a sufficient understanding of how to make a request for access to a record of the body, by providing a description of the subjects on which the body holds records, and the categories of records held on each subject;
- 1.3 know the description of the records of the body which are available in accordance with any other legislation;
- 1.4 access all the relevant contact details of the Information Officer and Deputy Information Officer who will assist the public with the records they intend to access;
- 1.5 know the description of the guide on how to use PAIA, as updated by the Regulator and how to obtain access to it;
- 1.6 know if the body will process personal information, the purpose of processing of personal information and the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.7 know the description of the categories of data subjects and of the information or categories of information relating thereto;
- 1.8 know the recipients or categories of recipients to whom the personal information may be supplied;
- 1.9 know if the body has planned to transfer or process personal information outside the Republic of South Africa and the recipients or categories of recipients to whom the personal information may be supplied; and
- 1.10 know whether the body has appropriate security measures to ensure the confidentiality, integrity and availability of the personal information which is to be processed.

3. KEY CONTACT DETAILS FOR ACCESS TO INFORMATION OF THE CIO FOR RESOLVE COPORATE SERVICES (PTY) LTD

3.1. Chief Information Officer: Resolve Corporate Services (Pty) Ltd

Name: Kirstin Redford (Managing Director) Tel: +27 72 594 3125
Email: kr@rslv.co.za

3.2. Access to information general contacts

Email: admin@rslv.co.za

3.3. National or Head Office

Postal Address:
P O Box 3094
Houghton 2041

Physical Address:
50 Oxford Road Parktown Johannesburg 2193

Telephone: +27 10 599 0221
Email: admin@rslv.co.za
Website: <https://www.rslv.co.za/>

SUMMARY OF THE GUIDE'S CONTENTS

Section	Description
Objectives of PAIA and POPIA	An overview of the purposes and goals of both Acts.
Contact Information	Postal and street addresses, phone and fax numbers, and email addresses of: - Information Officers of public bodies. - Deputy Information Officers of public and private bodies designated under PAIA and POPIA.
Request Procedures	Instructions on how to request access to records from: - Public bodies (as per section 11 of PAIA). Private bodies (as per section 50 of PAIA).
Assistance Available	Details on support provided by - Information Officers of public bodies. The Information Regulator.
Legal Remedies	Information on legal options available for acts or omissions concerning rights or duties under PAIA and POPIA, including procedures for: - Lodging internal appeals. - Filing complaints with the Information Regulator. - Applying to courts against decisions by Information Officers, internal appeal outcomes, or decisions by the Information Regulator or heads of private bodies.
Manuals Compilation	Guidance on sections 14 and 51, which require public and private bodies, respectively, to compile manuals, and instructions on how to access these manuals.
Voluntary Disclosure	Guidance on sections 14 and 51, which require public and private bodies, respectively, to compile manuals, and instructions on how to access these manuals.
Fee Notices	Details on sections 22 and 54, which pertain to fees payable for access requests.
Regulations	Information on regulations made under section 92 of PAIA.

- 3.4. The Guide is available in all official languages and in braille. It can be inspected or copied at the offices of public and private bodies, including the Information Regulator's office, during normal working hours. Additionally, the Guide can be obtained upon request from the Information Officer or downloaded from the Information Regulator's website: <https://info regulator.org.za/>

4. CATEGORIES OF RECORDS OF RESOLVE CORPORATE SERVICES (PTY) LTD WHICH ARE AVAILABLE WITHOUT A PERSON HAVING TO REQUEST ACCESS

Category of records	Types of the Record	Available on Website	Available upon request
Company Registrations	Registration Certificates and Incorporation Documents	Yes (if publicly registered)	By phone / email / letter request if not public
CIPC Annual Returns	Annual Returns Filing, Company Compliance with CIPC	☐	By phone / email / letter request if not public
Deregistrations	Deregistration Documents, Notices	☐	By phone / email / letter request if not public
Registered Address	Registered Address of the Company	☐	NA

5. DESCRIPTION OF THE RECORDS OF RESOLVE CORPORATE SERVICES (PTY) LTD WHICH ARE AVAILABLE IN ACCORDANCE WITH ANY OTHER LEGISLATION

Category of Records	Applicable Legislation
Memorandum of Incorporation	Companies Act 71 of 2008
PAIA Manual	Promotion of Access to Information Act 2 of 2000

6. DESCRIPTION OF THE SUBJECTS ON WHICH THE BODY HOLDS RECORDS AND CATEGORIES OF RECORDS HELD ON EACH SUBJECT BY RESOLVE CORPORATE SERVICES (PTY) LTD

- 6.1. Resolve maintains records across the categories and subject matters listed below.
- 6.2. The inclusion of a particular category or subject matter does not guarantee that access to the corresponding records will be granted. All access requests will be assessed individually, in accordance with the provisions of PAIA.
- 6.3. Please note that many of the records held by Resolve pertain to third parties – such as clients and employees, and we are committed to protecting the confidentiality of such information. Accordingly, requests involving third-party records will be reviewed with particular care.

Subjects on which the body holds records	Categories of records
Board Support	Board meeting minutes, agendas, resolutions, attendance records
Ultimate beneficial ownership	Statutory records, compliance and regulatory records, client and shareholder records, financial and taxation records, legal and governance records

Company Secretarial	Articles of Association, Governance Documents, Company Bylaws, Shareholder records Certificates
Company Registrations	Registration, Incorporation Documents, Company Name Registrations
CIPC Annual Returns	CIPC Annual Returns Filings, Compliance with CIPC regulations, Status Reports
Deregistrations	Deregistration Documents, Notices of Deregistration, CIPC Deregistration Filings
Corporate Governance	Governance Policies, Board Charters, Internal Audit Reports, Corporate Governance Reports
Statutory Compliance	Compliance Certifications, Regulatory Filings, Compliance Audits, Legal Compliance Reports
Group Restructures	Restructure Plans, Reports on Mergers and Acquisitions, Internal Restructure Documents
Registered Address	Registered Company Address, Legal Notices, Official Communication Address
Commercial	Commercial Contracts, Business Agreements, Memoranda of Understanding (MOUs), Partnership Agreements
Contract Management	Signed Contracts, Contract Amendments, Templates, Contract Renewals, Performance Reviews

7. PROCESSING OF PERSONAL INFORMATION

7.1 Purpose of Processing Personal Information

Corporate Services:

Board Support:

- Personal information such as contact details and identification information of board members may be processed to facilitate communication, coordination of meetings, and record-keeping of board resolutions and decisions. This ensures effective governance and decision-making within the organization.

Company Secretarial:

- Personal information of company directors, officers, and shareholders may be processed to maintain accurate and up-to-date corporate records as required by law. This includes the filing of necessary documents with regulatory bodies and ensuring compliance with corporate governance standards.

Company Registrations:

- Personal data may be processed during the registration process of the company or any changes to the company's registration details, such as director or shareholder information, to comply with statutory requirements set out by regulatory authorities.

CIPC Annual Returns:

- Personal details of directors, company secretaries, and shareholders may be processed to complete and submit annual returns to the Companies and Intellectual Property Commission (CIPC), ensuring compliance with the Companies Act.

Deregistrations:

- Personal information may be processed when deregistering a company or its officers, such as details of company directors, to comply with relevant legal and regulatory requirements during the deregistration process.

Corporate Governance:

- The organization processes personal information to ensure adherence to corporate governance standards. This includes processing personal details of board members and officers to create governance reports, ensuring transparency and accountability in decision-making.

Statutory Compliance:

- Personal data is processed to comply with local and international legal and regulatory requirements, including filing compliance reports, managing audits, and maintaining internal policies that align with statutory obligations.

Group Restructures:

- In the case of group restructures, personal information such as employee, shareholder, or director data may be processed to facilitate the planning and execution of such changes while ensuring compliance with relevant legal frameworks.

Registered Address:

- Personal contact information may be processed to ensure the organization's registered address is maintained and up to date for official communication and legal purposes.

7.2 Description of the categories of Data Subjects and of the information or categories of information relating thereto

Categories of Data Subjects	Personal Information that may be processed
Board Members	Full name, contact details (address, phone, email), identification numbers, board membership, meeting attendance, resolutions passed, voting records
Ultimate beneficial ownership	Full name, contact details (address, phone, email), identification numbers, nationality, country of residence, percentage of ownership in the company, type of shares held, voting rights, details of any indirect ownership, bank account details, financial statements (if applicable), legal and compliance records, company name and registration number, legal structure of connected entities and board memberships or directorships
Company Directors	Full name, contact details, identification numbers, directorship details, compliance status, CIPC registration information
Shareholders	Full name, contact details, shareholding information, identification numbers, share transfer records, shareholder meeting attendance
Company Officers (e.g., Company Secretary)	Full name, contact details, position, appointment records, regulatory compliance
Employees (in the case of company restructures)	Full name, contact details, job title, employment history, salary details, performance reviews, restructuring impact data
Customers and Clients	Contact details, contract details, financial information, payment records
Suppliers and Contractors	Company and personal contact details, contractual agreements, payment history
CIPC & Regulatory Authorities	Registration details, compliance data, regulatory submissions
Beneficiaries of Trusts	Full name, contact details, trust beneficiary status, identification numbers, trust agreements, financial records related to trust distributions

7.3 The recipients or categories of recipients to whom the personal information may be supplied

Category of personal information	Recipients or Categories of Recipients to whom the personal information may be supplied
Board Meeting Minutes, Agendas, Resolutions	Board members, Shareholders, Company auditors, Regulatory bodies (if required by law), Legal and corporate advisors
Director and Officer Information (e.g., names, contact details)	Regulatory authorities (e.g., CIPC), Company secretaries, Legal advisors, Auditors, Government agencies, Investors
Company Registration Details	CIPC, Regulatory bodies, Shareholders, Legal advisors, Government agencies
CIPC Annual Returns & Compliance Documents	CIPC, Regulatory bodies, Auditors, Shareholders, Legal advisors
Deregistration Information	CIPC, Regulatory bodies, Government agencies, Credit bureaus, Financial institutions (for credit history checks)
Corporate Governance Documentation (e.g., Board Charters)	Board members, Shareholders, Auditors, Legal advisors, Regulators
Statutory Compliance Documents	Regulatory authorities, Auditors, Government agencies, Compliance bodies, Legal advisors
Group Restructure Documents	Internal stakeholders (management, employees), Shareholders, Legal advisors, Regulatory authorities
Registered Address Information	Government agencies, Postal services, Legal advisors, Regulatory authorities
Commercial Contracts (e.g., terms, parties involved)	Contract signatories (clients, vendors), Legal advisors, Regulatory authorities, Auditors
Contractual Obligation Information	Legal advisors, Auditors, Contract parties (clients, suppliers), Regulators
Trust Deeds, Beneficiary Information	Trustees, Legal advisors, Regulatory bodies (if required by law), Beneficiaries for Ultimate Beneficial Ownership

7.4 Planned transborder flows of personal information

The entity may engage in the transborder transfer of personal information. This occurs when providing services to international clients, engaging with foreign regulatory bodies, or working with third-party service providers located outside of South Africa.

These transfers are conducted in compliance with the **Protection of Personal Information Act (POPIA)**, ensuring that adequate data protection measures are in place. The company takes reasonable steps to ensure that recipients of such information provide a level of protection that is substantially similar to the conditions for lawful processing as outlined in POPIA.

Personal information may be transferred across borders for purposes including, but not limited to:

- Client account management and service delivery
- Regulatory reporting and compliance with international financial regulations
- Cloud storage and data processing via secure third-party service providers
- Risk assessment and fraud prevention measures
- Communication with foreign partners, affiliates, or stakeholders

The company ensures that all transborder data transfers are made in accordance with contractual agreements, binding corporate rules, or other lawful transfer mechanisms as required by **POPIA** and other applicable data protection laws.

7.5 General description of Information Security Measures to be implemented by the responsible party to ensure the confidentiality, integrity, and availability of the information:

Confidentiality

- Access controls ensure that only authorized personnel can access personal information.
- Encryption is used to protect data during transmission and storage.
- Confidentiality agreements (NDAs) are required for employees and third parties.

Integrity

- Data validation ensures that personal information is accurate at the point of entry.
- Version control keeps track of changes and maintains data accuracy.
- Regular backups are performed to prevent data loss.
- Error detection and correction mechanisms address data inconsistencies.
- Integrity checks verify the consistency and accuracy of data over time.

Availability

- Redundancy and backup systems ensure personal information remains accessible during failures.
- Disaster recovery plans are in place to restore data after loss or disruption.
- Business continuity procedures guarantee data availability during emergencies.
- Access control policies restrict access to authorized users based on necessity.
- Cloud storage security ensures external systems meet security standards for availability.

Additional Security Measures

- Cybersecurity tools like firewalls and anti-virus software defend against cyber threats.
- Employee training ensures staff understand data protection best practices.
- Incident response plans enable quick action in case of a security breach.

These measures collectively safeguard personal information and ensure compliance with legal requirements while maintaining the organization's data security and operational continuity.

8. PROCEDURE FOR A REQUEST FOR ACCESS IN TERMS

A Requester must comply with all the procedural requirements as contained in section 53 of PAIA relating to a Request for Access to a Record. Requester must complete the prescribed Request for Access form attached as Appendix E, and submit the completed Request for Access form as well as payment of a request fee (if applicable) and a deposit (if applicable), to the Information Officer at the postal or physical address, facsimile number or electronic mail address stated in clause 3 above.

The Request for Access form must be completed with enough detail so as to enable the Information Officer to identify the following:

- 1) the Record/s requested;
- 2) the identity of the Requester;
- 3) the form of access that is required, if the request is granted;
- 4) the postal address or fax number of the Requester; and
- 5) the right that the Requester is seeking to protect and an explanation as to why the Record is necessary to exercise or protect such a right.

- 8.1. If a Request for Access is made on behalf of another person, the Requester must submit proof of the capacity in which the Requester is making the request to the reasonable satisfaction of the Information Officer.
- 8.2. If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.
- 8.3. The Company will voluntarily provide the requested Records to a Personal Requester (as defined in section 1 of PAIA). The prescribed fee for reproduction of the Record requested by a Personal Requester will be charged in accordance with section 54(6) of PAIA and clause 10 below.

9. GROUNDS FOR REFUSAL OF ACCESS TO RECORDS IN TERMS OF PAIA

The following are the grounds on which the Company may, subject to the exceptions contained in Chapter 4 of PAIA, refuse a Request for Access in accordance with Chapter 4 of PAIA:

- 9.1. mandatory protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of Personal Information would be unreasonable;
- 9.2. mandatory protection of the commercial information of a third party, if the Records contain:
 - 1) trade secrets of that third party;
 - 2) financial, commercial, scientific or technical information of the third party, the disclosure of which could likely cause harm to the financial or commercial interests of that third party; and/or
 - 3) information disclosed in confidence by a third party to the Company, the disclosure of which could put that third party at a disadvantage in contractual or other negotiations or prejudice the third party in commercial competition;
- 9.3. mandatory protection of confidential information of third parties if it is protected in terms of any agreement; protection of the privacy of a third party who is a natural person, including a deceased person, where such disclosure of Personal Information would be unreasonable;
- 9.4. mandatory protection of the safety of individuals and the protection of property;
- 9.5. mandatory protection of Records that would be regarded as privileged in legal proceedings;
- 9.6. protection of the commercial information of the Company, which may include:
 - 1) trade secrets;
 - 2) financial/commercial, scientific or technical information, the disclosure of which could likely cause harm to the financial or commercial interests of the Company;
 - 3) information which, if disclosed, could put the Company at a disadvantage in contractual or other negotiations or prejudice the Company in commercial competition; and/or
 - 4) computer programs which are owned by the Company, and which are protected by copyright and intellectual property laws;
- 9.7. research information of the Company or a third party, if such disclosure would place the research or the researcher at a serious disadvantage; and
- 9.8. Requests for Records that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources.

10. FEES

- 10.1. When the Request for Access is received by the Information Officer, the Information Officer will by notice require the Requester, other than a Personal Requester, to pay the prescribed request fee (if any), before further processing of the Request for Access.
- 10.2. Prescribed request fees are set out in the PAIA regulations.
- 10.3. If the search for a Record requires more than the prescribed hours for this purpose, the Information Officer will notify the Requester to pay as a deposit, the prescribed portion of the access fee (being not more than one third) which would be payable if the Request for Access is granted.
- 10.4. The Information Officer will withhold a Record until the Requester has paid the fees set out in the Regulations.
- 10.5. A Requester whose Request for Access to a Record has been granted, must pay an access fee for reproduction and for search and preparation, and for any time reasonably required in excess of the prescribed hours to search for and prepare the Record for disclosure, including making arrangements to make it available in a requested form provided for in PAIA.
- 10.6. If a deposit has been paid in respect of a Request for Access which is refused, the Information Officer will repay the deposit to the Requester.

11. AVAILABILITY OF THE MANUAL

A copy of the Manual is available-

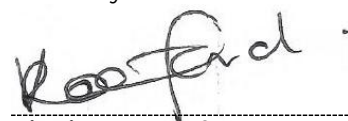
- 11.1. on <https://www.rslv.co.za/>;
- 11.2. head office of RESOLVE CORPORATE SERVICES (PTY) LTD for public inspection during normal business hours;
- 11.3. to any person upon request and upon the payment of a reasonable prescribed fee; and
- 11.4. to the Information Regulator upon request

12. UPDATING OF THE MANUAL

- 12.1. This Policy is reviewed annually to ensure its continuing compliance with the Government's PAIA regulation requirements.
- 12.2. A record of contextual changes, additions or omissions is given below:

Version	Revision date	Effective date	Significant changes
VI	February 2026	June 2026	N/A

Issued by



Kirstin Lee Redford
Managing Director

ANNEXURE E: REQUEST PROCEDURE

To facilitate the processing of your request, kindly complete and submit the form below to the e-mail address of the Deputy Information Officer indicated in Annexure A.

The Deputy Information Officer will notify the requester that a request for access has been received and that the prescribed fee (if any) is payable prior to processing the request. Please refer to Annexure F for a full breakdown of fees payable. Personal requesters will not be charged a request fee.

Once the request has been processed, the Deputy Information Officer will inform you of the outcome of your request and any additional fees that may fall due.

Please be advised that PAIA provides a number of grounds on which a request for access to information must be refused. These grounds mainly comprise instances where:

- the privacy and interests of other individuals are protected
- where such records are already otherwise publicly available
- instances where public interest are not served
- the mandatory protection of commercial information of a third party
- the mandatory protection of certain confidential information of a third party

When completing the form below please:

- indicate the identity of the person seeking access to the information
- provide sufficient particulars to enable the deputy information officer to identify the information requested
- specify the format in which the information is required
- indicate the contact details of the person requiring the information
- indicate the right to be exercised and/or to be protected, and specify the reasons why the information required will enable the person to protect and/or exercise the right
- where the person requesting the information wishes to be informed of the decision of the request in a particular manner, state the manner and particulars to be so informed
- if the request for information is made on behalf of another person, submit proof that the person submitting the request, has obtained the necessary authorisation to do so

A. Particulars of Private Body	
The Head:	
B. Particulars of person requesting access to the record	
i. The particulars of the person who requests access to the record must be recorded below	
ii. Furnish an address and/or fax number in the Republic to which information must be sent	
iii. Proof of the capacity in which the request is made, if applicable, must be attached	
Full names & surname:	
Identity number:	
Postal address:	
Fax number:	
Telephone number:	
Email address:	

Capacity:	
C. Particulars of person on whose behalf request is made	
This section must be completed <i>ONLY</i> if a request for information is made on behalf of another person	
Full names & surname:	
Identity number:	
D. Particulars of Record	
i. Provide full particulars of the record to which access is requested, including the reference number if that is known to you ii. If the provided space is inadequate, please continue on a separate page and attach to this form. Please sign any additional pages	
Description of record:	
Reference number:	
Any further particulars:	
E. Fees	
i. A request for access to a record, other than a record containing personal information about yourself, will be processed only after a request fee has been paid ii. You will be notified of the amount required to be paid as the request fee iii. The fee payable for access to a record depends on the form in which access is required and the reasonable time required to search for and prepare a record iv. If you qualify for exemption of the payment of any fee, please state the reason therefor	
Reason for exemption:	
F. Form of access to record	
If you are prevented by a disability to read, view or listen to the record in the form of access provided hereunder, please state your disability and indicate in which form the record is required	
Disability:	
Form in which required:	
Mark the appropriate box with an "X"	
i. Your indication as to the required form of access depends on the form in which the record is available ii. Access in the form requested may be refused in certain circumstances, In such a case you will be informed of access will be granted in another form iii. The fee payable for access to the record, if any, will be determined partly by the form in which access is requested	

1) If the record is in written or printed form:	
▪ copy of record	
▪ inspection of record	
2) If record consists of visual images:	
▪ view the images	
▪ copy of the images	
▪ transcription of the images	
3) If the record consists of recorded words or information which can be reproduced in sound:	
▪ listen to the soundtrack	
▪ transcription of the soundtrack	
4) If the record is held on computer or in an electronic or machine-readable form:	
▪ printed copy of record	
▪ copy in computer readable form	
Please indicate the preferred method of delivery	
▪ By hand	
▪ Email	
▪ Post	
▪ Fax	
G. Particulars of right to be exercised or protected	
If the provided space is inadequate, please continue on a separate folio and attach it to this form. The requester must sign all additional folios.	
Indicate which right is to be exercised or protected:	
Explain why the record requested is required for the exercise or protection of the aforementioned right:	
H. Notice of decision regarding the request for access	
You will be notified in writing whether your request has been approved / denied. If you wish to be informed thereof in another manner, please specify the manner and provide the necessary particulars to enable compliance with your request	
How would you prefer to be informed of the decision regarding your request for access to the record?	
I. Signature page	
Signed at:	
Date:	

Signature of Requester / Person on whose behalf request is made:

Head signature:

Date:

